

DOCKET SECTION
BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS MODEN TO INTERROGATORY OF
UNITED PARCEL SERVICE
(UPS/USPS-T4-10)

The United States Postal Service hereby provides the response of witness
Moden to the following interrogatory of United Parcel Service: UPS/USPS-T4-10,
filed on October 1, 1997.

The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Scott L. Reiter

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October 15, 1997

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MODEN
TO INTERROGATORIES OF UNITED PARCEL SERVICE

UPS/USPS-T4-10. Please refer to the attachment to your response to interrogatory APMU/USPS-T33-13(b), redirected from witness Sharkey. The first page of that attachment states, "On April 7, I provided you with seven initial steps to improve Priority Mail performance." Are the seven initial steps set forth in writing? If so, please produce a copy of the document listing those steps.

Response:

I have been unable to locate a copy of the April 7 memo that is referenced.

DECLARATION

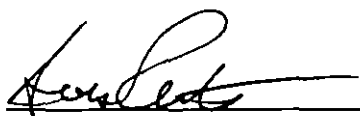
I, Ralph J. Moden, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information and belief.

Ralph J. Moden

Dated: 10/15/97

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.



Scott L. Reiter

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